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and Richard Snyder*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JOHN QUINTERO,  
  
Plaintiff,  
  
vs.  
  
ROMEO ARANAS, et al.,  
  
Defendants.

Case No. 3:17-cv-00066-MMD-CLB

**DEFENDANTS' MOTION FOR  
ENLARGEMENT OF TIME TO  
RESPOND TO PLAINTIFF'S  
INTERROGATORIES, REQUEST FOR  
ADMISSIONS, AND REQUEST FOR  
PRODUCTION OF DOCUMENTS  
(First Request)**

Defendant, Isidro Baca, James Dzurenda, E.K. McDaniel and Richard Snyder by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Harry B. Ward, Deputy Attorney General, hereby moves this Honorable Court for an enlargement of time to respond to Plaintiff's interrogatories, request for admissions, and second and third sets of request for production of documents.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. RELEVANT PROCEDURAL HISTORY**

This case is a *pro se* civil rights action pursuant to 42 U.S.C. §1983. (ECF No. 9 at 1.) Plaintiff, John Quintero (Plaintiff), is an inmate in the lawful custody of the Nevada Department of Corrections (NDOC". (*Id.*) Plaintiff sues various NDOC employees and alleges they violate his rights under the First, Eighth, and Fourteenth Amendments to the U.S. Constitution. (*Id.* at 3-22.)

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1 **II. LEGAL AUTHORITIES**

2 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and  
3 provides as follows:

4 When an act may or must be done within a specified time, the court  
5 may, for good cause, extend the time: (A) with or without motion or  
6 notice if the court acts, or if a request is made, before the original time or  
its extension expires; or (B) on motion made after the time has expired if  
the party failed to act because of excusable neglect.

7  
8 **III. ARGUMENT**

9 Defendants respectfully request a thirty (30) day extension of time out from the  
10 current deadline of December 2, 2019, to serve responses to Plaintiff's discovery requests  
11 to Defendants.

12 Due to the volume of information and documents requested, Defendants cannot  
13 timely answer Plaintiff's interrogatories, request for admissions, and request for  
14 production of documents. Defendants make this request in good faith, not for the purpose  
15 of unnecessary delay, and Defendants do not believe Plaintiff will be unduly prejudiced by  
16 the requested enlargement.

17 Additionally, the undersigned has been working with the staff in the Office of the  
18 Attorney General in an effort to meet the deadline, but unfortunately is unable to meet  
19 the deadline. Defendants submit there is good cause allowing Defendants an additional  
20 30 days to respond to the Plaintiff's discovery requests to ensure accurate and adequate  
21 response to the discovery. Accordingly, Defendants respectfully requests this Court allow  
22 Defendants up to and including Thursday, January 2, 2020, to answer Plaintiff's  
23 interrogatories, request for admissions, and second set of request for production of  
24 documents.

25 **IV. CONCLUSION**

26 Wherefore, Defendant submits that there is good cause for the extension of  
27 additional time in which to respond to the discovery request. This request for an  
28 extension of time is made in good faith and not for the purpose of undue delay.

Defendants respectfully requests this Court allow Defendants up to and including Thursday, January 2, 2020, to answer Plaintiff's interrogatories, request for admissions, and second set of request for production of documents.

Dated this 2nd day of December, 2019.

AARON D. FORD  
Attorney General

By: /s/Harry B. Ward  
HARRY B. WARD, Bar No. 11317  
Deputy Attorney General

*Attorneys for Defendants*

IT IS SO ORDERED  
S. J. Saldi  
U.S. MAGISTRATE JUDGE  
DATED: 12/3/2019

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 2nd day of December, 2019, I caused to be served a copy of the foregoing, **DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S INTERROGATORIES, REQUEST FOR ADMISSIONS, AND REQUEST FOR PRODUCTION OF DOCUMENTS (First Request)**, by U.S. District Court CM/ECF Electronic Filing to:

JOHN QUINTERO #93782  
NORTHERN NEVADA CORRECTIONAL CENTER  
C/O NNCC  
P.O. BOX 7000  
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/s/ Perla M. Hernandez  
An employee of the  
Office of the Attorney General